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OCT 21 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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October 21, 1994

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Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte -- MM Docket No. 92-260,
RM 8380 and CC Docket No. 87-266

Dear Mr. Caton:

In accordance with Section 1.1200 et seq. of the Commission's rules, this is to advise that on Thursday, October 20, 1994, Edward Milstein, Vice Chairman, and Peter Price, President, Liberty Cable Company, Inc. ("Liberty"), and Henry M. Rivera, Esq., Jay S. Newman, Esq., Lloyd Constantine, Esq., and W. James MacNaughton, Esq. met with Lynn Crakes, Julia Buchanan, Larry Walke, Richard Chesson and Jennifer Burton of the Cable Services Bureau and Marian Gordon of the Common Carrier Bureau to discuss Liberty's perspective, as contained in its previous filings with the Commission, on the above-captioned proceedings. The attachments to this letter were used in that discussion as well as two models to illustrate the cable inside wiring in multiple dwelling units. (Pages four and five of the attachment contain diagrams of these two models.) A total of three copies of this letter and the attachment are herewith provided to you, one copy for each proceeding.

An original and three copies of this letter and the attachment were filed with the Commission and a copy was delivered to the

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above-named Commission personnel on October 21, 1994, as the meeting was not over until after the Secretary's office closed.

Sincerely,


Jay S. Newman

Attachments

cc: Lynn Crakes
Julia Buchanan
Larry Walke
Richard Chesson
Jennifer Burton
Marian Gordon

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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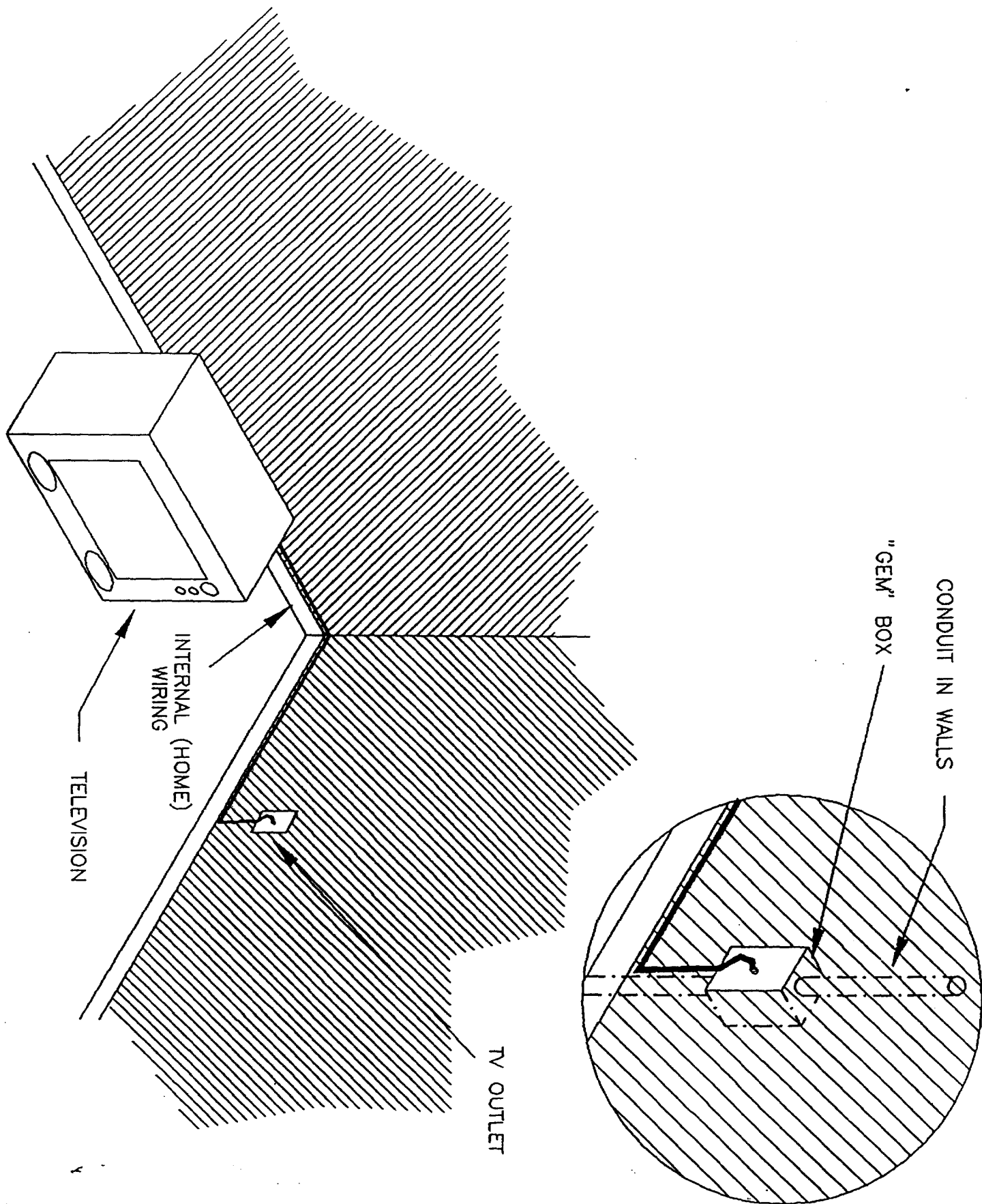
Henry M. Rivera
W. James MacNaughton
Lloyd Constantine
Jay S. Newman

October 20, 1994

LIBERTY CABLE COMPANY, INC.

CABLE HOME WIRING

- The demarcation point for cable home wiring in MDUs should be at the point:
 - * where the individual dedicated subscriber lines ("Individual Lines") can be detached from common lines ("Common Lines");
 - * without damaging the property or interfering with service to others;
 - * outside the subscriber's premises but on the MDU property.
- Cable home wiring should include conduits, moldings, gem boxes and other passive equipment used to hold cable home wiring.
- Cable home wiring should include splitters and other passive equipment used to connect Individual Lines to Common Lines.
- A wallplate demarcation point in MDUs is useless and will encourage abusive litigation.
- A wallplate demarcation point in MDUs will leave unanswered the legal status of Individual Lines located between the wallplate and the Common Line. This, as a result, will allow each of the fifty states, applying the common law of fixtures and chattels, to determine consumer access to Individual Lines by competing MVPDs.
- Cable home wiring should include a "loop through" system when all the subscribers on the "loop" switch to another MVPD. The MDU owner should acquire the "loop" (or affected parts).
- The cable home wiring rules do not cause a "taking" of property.



LIBERTY CABLE ENGINEERING DEPARTMENT
 215 EAST 95TH STREET, NEW YORK, NY 10123
 (212) 735-6700, (212) 735 5678 (FAX)

CONDUIT WIRING DETAIL
 PARALLEL SYSTEM WIRING
 DWG 1 OF 2

DRAWN BY: D.G.
 DATE: 7/27/93
 DWG: LBRTY-50

TIME WARNER RISER

LIBERTY RISER

LIBERTY TAP

WALL PLATE

"F" STYLE BARREL

"GEM" BOX

CONDUIT IN WALL

TIME WARNER RISER

LIBERTY RISER



LIBERTY CABLE ENGINEERING DEPARTMENT
215 EAST 95TH STREET, NEW YORK, NY 10128
(212) 735-6700, (212) 735 5678 (FAX)

CONDUIT WIRING DETAIL
PARALLEL SYSTEM WIRING
DWG 2 OF 2

DRAWN BY: D.G
DATE: 7/27/93
DWG: LBRTY-51

